

Nico Banks (CA SBN:344705)
BANKS LAW OFFICE
712 H St NE, Unit #8571
Washington, DC 20002
Tel.: 971-678-0036
Email: nico@bankslawoffice.com

Richard A. Nervig (CA SBN:226449)
RICHARD A. NERVIG, P.C.
501 West Broadway, Suite 800
San Diego, CA 92101
Phone: 760-451-2300
Email: richard@nerviglaw.com

Attorneys for Plaintiffs

LEVI Y. SILVER (SBN 273862)
SOLOMON WARD SEIDENWURM & SMITH, LLP
401 B Street, Suite 1200
San Diego, CA 92101
Phone: 619-231-0303
Email: lsilver@swsslaw.com

Attorneys for Defendant Mathew Crouch

CENTRAL DISTRICT OF CALIFORNIA

DAVID HOUGH: *et al.*

Plaintiffs.

VS.

RYAN CARROLL; *et al.*

Defendants.

1 Pursuant to Local Rule 7-1, plaintiffs David Hough, et al. (“Plaintiffs”) and
2 defendant Matthew Crouch (“Crouch”) hereby stipulate as follows.

3 1. Plaintiffs filed their initial complaint in this Court on April 9, 2024.
4 ECF No. 1. They filed a first amended complaint (“FAC”) on May 20, 2024. ECF
5 No. 56. The FAC named Crouch as a defendant for the first time.

6 2. On July 3, 2024, the Court approved a stipulation between Plaintiffs
7 and Crouch in which Crouch waived service of a summons in this action and Crouch
8 was given until September 30, 2024, to respond to the FAC.

9 3. On September 11, 2024, after Plaintiffs indicated that they intended to
10 file a Second Amended Complaint (“SAC”), Plaintiffs and Crouch stipulated,
11 subject to the Court’s approval, to stay Crouch’s time to file a responsive pleading
12 until 30 days from the date Plaintiffs filed their then-anticipated SAC, ECF No. 136.
13 On September 26, 2024, the Court approved the Stipulation and set Crouch’s
14 deadline to respond to the anticipated SAC for 30 days after the date of the SAC’s
15 filing. ECF. No. 139.

16 4. On November 27, 2024, this Court granted Plaintiffs’ motion for leave
17 to file the SAC. ECF No. 167.

18 5. On December 4, 2024, Plaintiffs filed their SAC. ECF No. 173.
19 Pursuant to the SAC Stipulation, Crouch believes its response to the SAC is
20 currently due on January 3, 2025.

21 6. As set forth in more detail in the accompanying declaration of Levi Y.
22 Silver, this response deadline poses scheduling difficulties associated with the
23 upcoming holidays. Accordingly, Plaintiffs and Crouch have agreed that Crouch’s
24 deadline to respond to the SAC should be extended until January 17, 2025.

25 / / /

26 / / /

27 / / /

28 / / /

1 Pursuant to L.R. 7-1 and 52-4.1, a separate proposed order to this effect is
2 included herewith.

3 **IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.**

4 DATED: December 20, 2024 SOLOMON WARD SEIDENWURM &
5 SMITH, LLP

6 By: /s/ Levi Y. Silver

7 LEVI Y. SILVER
8 **Attorneys for Defendant**
9 **Matthew Crouch**

10 DATED: December 20, 2024 BANKS LAW OFFICE

11 By: /s/ Nico Bank

12 Nico Bank (CA SBN: 344705)
13 **Attorneys for Plaintiffs**

14 **ATTESTATION**

15 Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on
16 whose behalf the filing is submitted, concur in the filing's content and have
17 authorized the filing.
18

19 /s/ Levi Y. Silver

20 Levi Y. Silver

21 P:01786218.1:90D08.002
22
23
24
25
26
27
28